

- (i) producing “copies of all communications between and among any of [himself], Valkyrie Group LLC, Valhalla Venture Group LLC, Brandon Austin, Hugh Austin, Tracy Evans, ‘Dmitri,’ and Ming Hoang Le, or any of their affiliates, representatives and/or agents, concerning the Bitcoin Agreement, the Escrow Agreement, and/or the funds deposited by Benthos into [his] IOLA account” (Dkt. 4 at ¶ 4(a)); and
- (ii) certifying under penalty of perjury that all such communications have been produced; and
- (iii) submitting to a deposition under the auspices of the Court; and

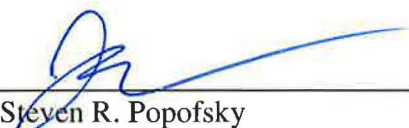
(d) Awarding such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the Court's order of November 15, 2018, any opposing affidavits and answering memoranda shall be served upon Petitioner's counsel within five (5) days after service of these moving papers.

Dated: November 20, 2018

**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**

By: \_\_\_\_\_

  
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